

Attorneys At Law

## GEORGE W. WRIGHT & ASSOCIATES, LLC

April 30, 2020

George W. Wright\* Narinder S. Parmar\*

## **VIA ECF**

Hon. Lorna G. Schofield, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re:

Zurich North American Insurance Company a/s/o Mallinckrodt Hospital Products, Inc., and Mallinckrodt Hospital Products, Inc. v. Savino Del Bene S.P.A., Savino Del Bene USA, Inc., ASF Intermodal, LCC, and Containerport Group, Inc. Civil Action No. 1:20-cv-00802(LGS)

Dear Judge Schofield:

We are counsel for defendants ASF Intermodal, LCC, ("ASF") and Containerport Group, Inc. ("Containerport") and write to respectfully request a 30-day adjournment of the dates set forth in the Court's March 20, 2020 Order (Doc. 15).

The reason for our request is that ASF and Containerport have not yet filed an Answer in this action. Our office filed Notices of Appearance yesterday and we are still reviewing our clients' relevant files to enable us to complete the required joint letter and civil case management plan.

AFS and Containerport have not previously requested any extensions and counsel for the other parties consent to this request.

We respectfully request that the initial pretrial conference be adjourned to June 8, 2020 or the next available date.

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We thank you for your attention and consideration.

Respectfully submitted,

George W. Wright

GWW:ds

cc. Nathan T. Williams, Esq. (Via ECF)

Eric M. James, Esq. (Via ECF)

Andrew Spector, Esq. (Via ECF)

Marc A. Rubin, Esq. (Via ECF)

Rob Moseley, Esq. (Via E-Mail - rob.moseley@momarlaw.com)

Application GRANTED in part. The initial pre-trial conference scheduled for May 7, 2020, is adjourned to **May 28, 2020, at 10:50 a.m.** The parties are reminded that the joint pre-conference materials are due one week before the conference, or by **May 21, 2020**.

The parties are advised that, pursuant to the Individual Rules, requests for extensions must be made at least two business days before the deadline.

Dated: April 30, 2020

New York, New York

LORNA G. SCHOFIELD

United States District Judge